

1 **STATE OF CALIFORNIA**

2
3 **WATER RESOURCES CONTROL BOARD**
4 **DIVISION OF DRINKING WATER**

5
6 **IN RE:** City of Holtville
7

8
9 **ATTN:** Nick Wells
10 City Manager
11 City of Holtville
12 121 West 5th St.
13 Holtville, CA 92250
14
15
16

17 **CITATION No. 05-14-16C-007**

18 **FOR VIOLATION OF**

19 **CALIFORNIA HEALTH AND SAFETY CODE, SECTIONS 116555(A)(1)**
20 **CALIFORNIA CODE OF REGULATIONS, TITLE 22 SECTIONS 64465(c)(2),**
21 **64533(a), 64537(d), & 64537.2(a)(5) & (6).**

22 **WATER SYSTEM NO. 1310005**

23
24 **ISSUED ON October 10, 2016**
25
26

27 The State Water Resources Control Board (hereinafter "Board"), acting by and
28 through its Division of Drinking Water (hereinafter "Division") and the Deputy Director
29 for the Division (hereinafter "Deputy Director"), hereby issues this Compliance Order
30 (hereinafter "Order") pursuant to Section 116655 of the California Health and Safety
31 Code (hereinafter "CHSC") to the City of Holtville (hereinafter, Holtville) water system
32 for violation of CHSC Section 116555(a)(1), California Code of Regulations, Title 22,

(hereinafter "CCR, Title 22") §64465(c)(2), §64533(a), §64537(d), and §64537.2(a)(5)
& (6)

APPLICABLE AUTHORITIES

CHSC, §116650 provides:

116650. Citations.

(a) If the department determines that a public water system is in violation of this chapter or any regulation, permit, standard, citation, or order issued or adopted thereunder, the department may issue a citation to the public water system. The citation shall be served upon the public water system personally or by certified mail. Service shall be deemed effective as of the date of personal service or the date of receipt of the certified mail. If a person to whom a citation is directed refuses to accept delivery of the certified mail, the date of service shall be deemed to be the date of mailing.

(b) Each citation shall be in writing and shall describe the nature of the violation or violations, including a reference to the statutory provision, standard, order, citation, permit, or regulation alleged to have been violated.

(c) A citation may specify a date for elimination or correction of the condition constituting the violation.

(d) A citation may include the assessment of a penalty as specified in subdivision (e).

1 (e) The department may assess a penalty in an amount not to exceed
2 one thousand dollars (\$1,000) per day for each day that a violation
3 occurred, and for each day that a violation continues to occur. A
4 separate penalty may be assessed for each violation.
5

6 **CHSC, §116555 provides:**

7 116555. Operational Requirements.

8 (a) Any person who owns a public water system shall ensure that the
9 system does all of the following:

10 (1) Complies with primary and secondary drinking water standards.
11

12 **CCR Title 22, §64465, subsection (c) provides, in relevant part:**

13 (c) A public water system providing notice pursuant to this article shall comply
14 with the following multilingual-related requirements:

15 ...

16 (2) For a Tier 2 or Tier 3 public notice:

17 (A) The notice shall contain information in Spanish regarding the
18 importance of the notice, or contain a telephone number or address where
19 Spanish-speaking residents may contact the public water system to obtain
20 a translated copy of the notice or assistance in Spanish; and

21 (B) When a non-English speaking group other than Spanish-speaking
22 exceeds 1,000 residents or 10 percent of the residents served by the public
23 water system, the notice shall include:



1. Information in the appropriate language(s) regarding the importance of the notice; or

2. A telephone number or address where such residents may contact the public water system to obtain a translated copy of the notice or assistance in the appropriate language;

CCR, Title 22, §64533 provides, in relevant part:

(a) Using the monitoring and calculation methods specified in sections 64534, 64534.2, 64535, and 64535.2, the primary Maximum Contaminant Level (MCL) for the total trihalomethanes (TTHMs) shown in Title 22 Table 64533-A shall not be exceeded in drinking water supplied to the public.

Table 64533-A

Maximum Contaminant Levels and Detection Limits for

Purposes of Reporting Disinfection Byproducts

Disinfection Byproduct	Maximum Contaminant Level (mg/L)	Detection Limit for Purposes of Reporting (mg/L)
Total trihalomethanes (TTHM)	0.080	
Bromodichloromethane		0.0010
Bromoform		0.0010
Chloroform		0.0010
Dibromochloromethane		0.0010
Haloacetic acids (five) (HAA5)	0.060	
Monochloroacetic Acid		0.0020
Dichloroacetic Acid		0.0010
Trichloroacetic Acid		0.0010
Monobromoacetic Acid		0.0010
Dibromoacetic Acid		0.0010

1
2 **CCR Title 22, §64535.2, subsection (e) provides, in relevant part:**

3 (e) Total Trihalomethanes (TTHM) and Haloacetic acids (five) (HAA5) MCL
4 compliance, as monitored pursuant to section 64534.2(d), shall be determined
5 as follows:

6 (1) For systems monitoring quarterly, each locational running annual average
7 (LRAA), computed quarterly, shall not exceed the MCLs specified in section
8 64533;

9 ...

10 (4) If the LRAA exceeds the MCL, calculated based on four consecutive
11 quarters of monitoring (or the LRAA calculated based on fewer than four
12 quarters of data if the MCL would be exceeded regardless of the monitoring
13 results of subsequent quarters), the system is in violation of the MCL and shall
14 notify the public pursuant to sections 64463, 64463.4, and 64465, including the
15 language in appendix 64465-G, in addition to reporting to the Department
16 pursuant to sections 64537 through 64537.6.”

17
18 **CCR Title 22, §64537 provides, in relevant part:**

19 (d) Systems required to conduct an operational evaluation pursuant to section
20 64534.2(d)(6) shall submit a written report of the evaluation to the State Board
21 no later than 90 days after being notified of the analytical result that caused the
22 OEL exceedance. Systems shall make the written report available to the public
23 upon request. If the State Board approves the system’s written request to limit

1 the scope of the evaluation under section 64534.2(d)(6), the system shall keep
2 the written approval with the completed report.

3

4 **CCR Title 22, §64537.2 provides, in relevant part:**

5 Systems shall report to the State Board the information specified in table
6 64537.2-B.

7

8

9

Table 64537.2-B
TTHM and HAA5 Reporting

*If the system is monitoring
under the requirements of
section 64534.2(d) for...*

The system shall report...

TTHM and HAA5

- (a) For each monitoring location:
- (1) The number of samples taken during the last quarter;
 - (2) The date and results of each sample taken during the last quarter;
 - (3) The arithmetic average of quarterly results for the last four quarters (LRAA);
 - (4) Whether the LRAA calculated based on fewer than four quarters of data would cause the MCL to be exceeded regardless of the monitoring results of subsequent quarters;
 - (5) Whether, based on section 64535.2(e), the MCL was violated at any monitoring location; and
 - (6) Any operational evaluation levels that were exceeded during the quarter and, if so, the location and date, and the calculated TTHM and HAA5 levels.

10

11

12

ENFORCEMENT HISTORY

In the 13-quarter Stage 1 Disinfection Byproduct Rule (DBPR) monitoring period, between 3rd quarter of 2010 and 3rd Quarter of 2013, the City of Holtville (hereinafter, Water System) was in continuous violation of the TTHM MCL Running Annual Average (RAA).

In the 11-quarter Stage 2 DBPR monitoring period, between 4th quarter 2013 and 2nd Quarter of 2016, the Water System was in continuous violation of the TTHM MCL Local Running Annual Average (LRAA) at both monitoring locations.

On July 25, 2011, a Citation for Noncompliance (05-14-11C-014) was issued for failure to meet the TTHM MCL during the 3rd and 4th quarters of 2010, and the 1st and 2nd quarters of 2011.

On September 20th, 2011, in response to Citation 05-14-11C-014, the Water System submitted a TTHM reduction plan that included 1) the addition of a 1.5 million-gallon (MG) reservoir designed for the purpose of providing an increase in disinfection contact time (CT) credit, and 2) the addition of an ultraviolet (UV) disinfection system, also for the purpose of providing an increase in disinfection CT credit.

The reservoir was placed into service in November 2012 and the UV system was placed into service in April 2013. However, the Water System continued to exceed the TTHM LRAA MCL.

On April 4th, 2014, a Notice of Violation for failure to provide public notification during the Stage 1 DBPR to Stage 2 DBPR transition. Following the Notice of Violation, the Water System completed the required public notification.

On September 20th, 2015, the Water System proposed a Raw Water TOC Reduction pilot study using permanganate as a pre-oxidant. In "Citation 05-14-11C-014: TTHM

1 Reduction Plan” (Pilot Study) letter, dated July 5th, 2016 (Attachment 1), the Division
2 approved the pilot study and the TTHM spray aeration treatment project schedule,
3 dated March 2016 (Attachment 2). The approval letter also allowed the Water System
4 to submit quarterly updates on progress made on the pilot study and the spray
5 aeration project in-lieu of quarterly OEL reports.

6
7 **STATEMENT OF FACTS**

8 Division is informed by the Water System and believes that the Water System is a
9 community water system located in Imperial County that supplies water for domestic
10 purposes to approximately 6,032 customers through approximately 1,473 service
11 connections. The Water System operates under Domestic Water Supply Permit No.
12 04-14-98P-004, issued on January 27, 1998 and Domestic Water Supply Permit
13 Amendment No. 05-14-15PA-009, issued on August 13, 2015.

14
15 The Water System is a Schedule 4 system under the Stage 2 Disinfection Byproducts
16 Rule (DBPR). As of October 1, 2013, pursuant to CCR, Title 22, Section 64534.2(d),
17 the Water System was placed on increased monitoring and was required to collect
18 two distribution system sample per quarter for TTHM and HAA5 analyses at two
19 locations approved in their “Stage 2 DBPR Compliance Monitoring Plan” (CMP) letter,
20 dated May 23, 2013 (Attachment 3) **Table 1**, below:
21

Table 1: Stage 2 DBPR Sampling Location

PS Code	Location	Pressure Zone	Source Reservoir
1310005-900	Site 9 (Hydrant on Underwood)	Main: NW	Distribution Reservoir
1310005-901	Site 10 (Hydrant on Anderholt)	Main: SW	Distribution Reservoir

The CMP letter informed the Water System of the following Stage 2 reporting requirements:

- The Water System is required to sample in the months of February, May, August and November, and ,per CCR, Title 22, Section 64537(a), the Water System is required to submit laboratory analysis hardcopies, chain of custody and a signed Compliance Calculation and OEL Spreadsheet forms, to the Division by the 10th day of the month following the monitoring quarter.
- Per CCR, Title 22, Section 64469(c), the Water System's laboratory is required to electronically submit analytical results via EDT the using the PS Code shown in Table 1, above.
- Per CCR, Title 22, Section 64463(a)(1), the Water System is required to notify the Division when an MCL or OEL exceedance has occurred.
- Per CCR, Title 22, Section 64463(a)(1), the Water System is required to perform an Operational Evaluation if the OEL is exceeded.
- Per CCR, Title 22, Section 64537(d), the Water System is required to submit an Operational Evaluation Report to DDW no later than 90-days after being notified by the laboratory of the analytical result that causes the OEL to exceed the limit.
- Per CCR, Title 22, Section 64463.4, the Water System is required to continue the Tier 2 Public notification requirements during the transition period between Stage 1 and Stage 2 for ongoing existing Stage 1 MCL violations. Public notification is required to continue until four-quarters of Stage 2 results are collected and a new LRAA is calculated.



During the period of 4th quarter 2013 through 2nd quarter 2016, the Water System collected TTHM and HAA5 samples as required. The Stage 2 DBPR HAA5 results for this period are discussed in Citation No. 05-14-16C-006, issued October 10, 2016. The TTHM results for Site 9 for this period are shown in **Table 2, Table 3, and Table 4**. The TTHM results for Site 10 for this period are shown in **Table 5, Table 6 and Table 7**.

**Table 2: Holtville's 4th Quarter 2013-2014
TTHM Results Site 9 (all results in µg/L)**

Sample Site	4 th Q 2013	1 st Q 2014	2 nd Q 2014	3 rd Q 2014	4 th Q 2014
Site 9	82	91	91	110	83
OEL Calculations			2 nd Q 2014	3 rd Q 2014	4 th Q 2014
Site 9	-	-	89	101	92
LRAA Calculations				3 rd Q 2014	4 th Q 2014
Site 9	128			94	94
Public Notification					
Required	Yes			Yes	Yes
Certification Submitted	No. NOV issued April 2014			Yes	Yes

**Table 3: Holtville's 2015
TTHM Results Site 9 (all results in ppb)**

Sample Site	1 st Q 2015	2 nd Q 2015	3 rd Q 2015	4 th Q 2015
Site 9	86	110	140	77
OEL Calculations	1st Q 2015	2nd Q 2015	3rd Q 2015	4th Q 2015
Site 9	91	97	119	101
LRAA Calculations	1st Q 2015	2nd Q 2015	3rd Q 2015	4th Q 2015
Site 9	93	97	105	103
Public Notification				
Required	Yes	Yes	Yes	Yes
Certification Submitted	Yes	Yes	Yes	Yes

**Table 4: Holtville's 2016
TTHM Results Site 9 (all results in ppb)**

Sample Site	1 st Q 2016	2 nd Q 2016	3 rd Q 2016
Site 9	65	93	92
OEL Calculations	1 st Q 2016	2 nd Q 2016	3 rd Q 2016
Site 9	87	82	86
LRAA Calculations	1 st Q 2016	2 nd Q 2016	3 rd Q 2016
Site 9	98	94	82
Public Notification			
Required	Yes	Yes	Yes
Certification Submitted	Yes	Yes	Pending

**Table 5: Holtville's 4th Quarter 2013-2014
TTHM Results Site 10 (all results in µg/L)**

Sample Site	4 th Q 2013	1 st Q 2014	2 nd Q 2014	3 rd Q 2014	4 th Q 2014
Site 10	69	78	93	130	84
OEL Calculations			2 nd Q 2014	3 rd Q 2014	4 th Q 2014
Site 10	-	-	83	108	98
LRAA Calculations				3 rd Q 2014	4 th Q 2014
Site 10	128			93	96
Public Notification					
Required	Yes			Yes	Yes
Certification Submitted	No. NOV issued April 2014			Yes	Yes

**Table 6: Holtville's 2015
TTHM Results Site 10 (all results in ppb)**

Sample Site	1 st Q 2015	2 nd Q 2015	3 rd Q 2015	4 th Q 2015
Site 10	88	110	140	80
OEL Calculations	1 st Q 2015	2 nd Q 2015	3 rd Q 2015	4 th Q 2015
Site 10	98	98	119	103
LRAA Calculations	1 st Q 2015	2 nd Q 2015	3 rd Q 2015	4 th Q 2015
Site 10	99	103	106	105
Public Notification				
Required	Yes	Yes	Yes	Yes
Certification Submitted	Yes	Yes	Yes	Yes



**Table 7: Holtville's 2016
TTHM Results Site 10 (all results in ppb)**

Sample Site	1 st Q 2016	2 nd Q 2016	3 rd Q 2016
Site 10	66	91	83
OEL Calculations	1st Q 2016	2nd Q 2016	3rd Q 2016
Site 10	88	82	81
LRAA Calculations	1st Q 2016	2nd Q 2016	3rd Q 2016
Site 10	99	94	80
Public Notification			
Required	Yes	Yes	No
Certification Submitted	Yes	Yes	Pending

Per **Tables 2 and 5**, in the 3-quarter period during the transition period between Stage 1 and Stage 2, between the 4th quarter of 2013 through 2nd quarter of 2014, the Water System performed Tier 2 Public notification for Stage 1 Running Annual Average (RAA) MCL violation that occurred in the 3rd quarter of 2013.

Per **Tables 2, 3, 4, 5, 6, and 7**, the Water System exceeded the TTHM OEL of 80 ppb at the Site 9 & Site 10 sample sites in the 2nd, 3rd and 4th quarters of 2014, 1st, 2nd, 3rd and 4th quarters of 2015, and 1st, 2nd, and 3rd quarters of 2016. Additionally, the Water System exceeded the TTHM LRAA MCL of 80 ppb at the Site 9 & Site 10 sample site in the 3rd and 4th quarters of 2014, 1st, 2nd, 3rd and 4th quarters of 2015, and 1st and 2nd quarters of 2016. Per **Table 4** the Water System also exceeded the TTHM LRAA MCL of 80 ppb at Site 9 sample site 3rd quarter of 2016.

The Water System was informed of the Tier 2 public notification requirements in the CMP letter, (Attachment 3). The Water System performed Tier 2 public notification for Stage 2 TTHM LRAA MCL violations, but failed to meet the Spanish language public notification requirements of CCR, Title 22, §64465(c)(2).



1 The Water System was informed of the OEL reporting requirements in the CMP letter,
2 (Attachment 3). However, the Water System has failed to submit three (3) OEL
3 reports to the Division for the 3rd and 4th quarters of 2014, and 1st quarter of 2015.
4

5 DETERMINATIONS

6
7 Based on the above Statement of Facts, the Division has found that the Water
8 System has violated the CHSC, Section 116555. Specifically, the Water System has
9 failed to provide a reliable and adequate supply of pure, wholesome, healthful, and
10 potable water.
11

12 The Division determined that for 3rd and 4th quarters of 2014, and 1st quarter of 2015,
13 the Water System violated CCR, Title 22, §64537(d) for failure to submit OEL reports
14 to the Division no later than 90 days after being notified of the analytical result that
15 caused the OEL exceedance.
16

17 The Division has determined that for 3rd and 4th quarters of 2014, 1st, 2nd, 3rd and 4th
18 quarters of 2015, and 1st and 2nd quarters of 2016, the Water System violated CCR,
19 Title 22, §64533(a) for the LRAA TTHM MCL at the Site 9 and 10 sample sites.
20

21 The Division has determined that for 3rd quarter of 2016, the Water System violated
22 CCR, Title 22, §64533(a) for the LRAA TTHM MCL at the Site 9 site.
23

24 Finally, the Division determined the Water System for 3rd and 4th quarters of 2014, 1st,
25 2nd, 3rd and 4th quarters of 2015, and 1st and 2nd quarters of 2016, did not meet the



1 Spanish language public notification requirements of CCR, Title 22, §64465(c)(2) for
2 the Tier 2 TTHM public notifications.

3
4 **DIRECTIVES**

5 Water System is hereby directed to take the following actions:

- 6 1. At all times subsequent to this Citation, comply with CCR, Title 22, §64533.
- 7 2. Starting on July 1, 2016, the Water System shall submit all documents to the
8 Division following the procedures described in the District 14 guidelines for
9 electronic submission to the Electronic Content Management (ECM) system,
10 current version dated June 29, 2016. (Attachment 4).
- 11 3. Not later than ten (10) days following the date of compliance with the TTHM LRAA
12 MCL, demonstrate to the Division that the water delivered by the Water System
13 complies with the TTHM LRAA MCL.
- 14 4. On or before November 10, 2016, the Water System shall give public notification
15 for the TTHM LRAA MCL violations in accordance with CCR, Title 22, Section
16 64463.4 and the Spanish language public notification requirements of CCR, Title
17 22, §64465(c)(2). Public notice shall be via 1. Mail or direct delivery to each
18 customer, and 2. Posting notice using one or more of the following methods:
19 posting on the internet and/or local newspaper, posting in conspicuous public
20 spaces served by the water system, and delivery to community organizations. A
21 draft notification shall be submitted to the Division for review and approval prior to

conducting public notification. The public notice shall be updated quarterly with the most recent TTHM results.

5. On or before **November 10, 2016**, the Water System shall provide to the Division certification of public notification using the enclosed form (Attachment 5).

6. The Water System shall include information regarding the TTHM MCL violation identified in this Citation in the 2016 Consumer Confidence Report, which shall be completed and distributed to customers by July 1, 2017. A draft of the 2016 Consumer Confidence Report shall be submitted to the Division for review and approval prior to distribution and/or posting.

7. The Water System shall submit laboratory analysis hardcopies, chain of custody and a signed Compliance Calculation and OEL Spreadsheet forms, to the Division by the 15th day of the month following the monitoring quarter

8. On or before **November 10, 2016**, the Water System shall provide to the Division details on the distribution system TTHM reduction driven flushing program. These details shall minimally include:

- a. Distribution system map indicating the flushing zones and DBP monitoring locations.
- b. The rotating schedule for flushing each zone.



1 c. A quarterly report stating when which zone was last flushed. Quarterly
2 updates shall be submitted by the 15th day of the months of February,
3 May, August, and November.
4

5 9. The Water System shall complete a Division approved TTHM removal treatment
6 project (hereinafter Project) according to the following schedule:

7 a. The Water System shall complete the SUSP rate study on or before
8 December 1, 2016.

9 b. The Water System shall submit to the completed SRF financial packet to
10 the Division of Financial Assistance on or before December 15, 2016.
11

12 10. By November 30, 2016, the Water System shall revise the March 2016 Project
13 Schedule, enclosed, to include the new rate study and financial packet completion
14 deadlines, and resubmit the schedule for Division approval.

15 a. The Water System shall comply with the DDW approved Spray Aeration
16 Project schedule.
17

18 11. The Water System shall implement the approved TTHM Reduction Plan, which
19 includes the following elements at a minimum:
20

21 a. Monthly permanganate dosage tracking that indicates the dates of
22 dosing changes. Monthly permanganate monitoring must be submitted

1 by the 10th day of the month along with Monthly Summary of Monitoring
2 for Surface Water Treatment Regulations reporting.

3
4 b. Total Organic Carbon (TOC) monthly monitoring shall be conducted at
5 the following three locations:

- 6 i. Pear Canal (raw untreated sample),
7 ii. Raw Water Ponds settled effluent (taken off 12" inlet pipe at
8 water plant),
9 iii. Post filtration (taken from filter clearwell sample line)

10
11 c. Monthly TOC lab analysis reporting must be submitted by the 10th day of
12 the month along with Monthly Summary of Monitoring for Surface Water
13 Treatment Regulations reporting.

14
15 d. The monthly TOC monitoring at Pear Canal and the Distribution System
16 Entrance shall be submitted via EDT to the following PS Codes:

17

TOC Sample Site	PS Code
Pear Canal	1310005-001
Raw Pond	No EDT
Distribution System Entrance	1310005-002

18
19 e. Monthly TTHM and HAA5 monitoring shall be performed at the following
20 three locations:

- 21 i. Existing Stage 2 DBPR monitoring location Site #9

ii. Existing Stage 2 DBPR monitoring location Site #10

iii. Entrance to the distribution system

f. The DBP monitoring data shall be submitted via EDT to the following PS Codes:

Stage 2 Sample Site	PS Code	Pressure Zone
Site #9, Hydrant	1310005-900	Main Zone: NW
Site #10, Hydrant	1310005-901	Main Zone: SW
Distribution System Entrance	1310005-002	Post-clearwell

g. The Water System shall ensure the contracted laboratory EDTs the analysis results for total trihalomethanes and haloacetic acid analyte levels, and all of the disinfection byproduct sub-species. The complete list of DBP analytes is listed in the table below:

Analyte	Sub-Species
Total Trihalomethanes (TTHMs)	Bromodichloromethane
	Bromoform
	Chloroform (Trichloromethane)
	Dibromochloromethane
Haloacetic Acids (HAA5)	Monochloroacetic Acid (MCAA)
	Dichloroacetic Acid (DCAA)
	Trichloroacetic Acid (TCAA)
	Monobromoacetic Acid (MBAA)
	Dibromoacetic Acid (DBAA)

h. The Water System shall provide to the Division Quarterly Progress Reports for the TTHM Removal System and the Spray Aeration Project

1 in lieu of an OEL Report. Quarterly updates shall be submitted by the
2 15th day of the months of February, May, August, and November.
3

4 The Division reserves the right to make such modifications to this Citation as it may
5 deem necessary to protect public health and safety. Such modifications may be
6 issued as amendments to this Citation, and shall be deemed effective upon issuance.
7 Nothing in this Citation relieves Holtville of its obligation to meet the requirements of
8 the California Safe Drinking Water Act, or of any regulation, permit, standard, or order
9 issued or adopted thereunder.
10

11 All submittals required by this Citation shall be submitted to the Division at the
12 following address:

13 Sean Sterchi, P.E.
14 District Engineer
15 State Water Resources Control Board
16 Division of Drinking Water
17 1350 Front Street, Room 2050
18 San Diego, CA 92101
19
20
21

22 **PARTIES BOUND**

23 This Citation shall apply to and be binding upon Holtville, its officers, directors,
24 shareholders, agents, employees, contractors, successors, and assignees.

25 **SEVERABILITY**

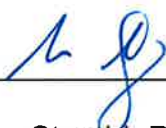
26 The Directives of this Citation are severable, and Holtville shall comply with each and
27 every provision thereof, notwithstanding the effectiveness of any other provision.

1 **FURTHER ENFORCEMENT ACTION**

2 The California SDWA authorizes the Board to: issue citation with assessment of
3 administrative penalties to a public water system for violation or continued violation of
4 the requirements of the California SDWA or any permit, regulation, standard or order
5 issued or adopted thereunder including, but not limited to, failure to correct a violation
6 identified in a citation or compliance order. The California SDWA also authorizes the
7 Board to take action to suspend or revoke a permit that has been issued to a public
8 water system if the system has violated applicable law or regulations or has failed to
9 comply with an order of the Board; and to petition the superior court to take various
10 enforcement measures against a public water system that has failed to comply with
11 an order of the Board. The Board does not waive any further enforcement action by
12 issuance of this citation.

13
14 10/10/16

15 Date

14 

15 Sean Sterchi, P.E.
16 District Engineer
17 Division of Drinking Water
18 State Water Resources Control Board
19

20 CERTIFIED MAIL NO. 7015 3010 0001 9444 3316

21
22 cc: Jeff Lamoure, Deputy Director for Environmental Health Services, County of
23 Imperial (via email)
24
25

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Enclosure:

1. Citation 05-14-11C-014: TTHM Reduction Plan letter
2. TTHM Spray Aeration Treatment Project Schedule
3. Stage 2 DBPR Compliance Monitoring Plan
4. District 14 Guidelines for Electronic Submission to The Electronic Content Management (ECM) System
5. Public Notification Certification

Attachment 1



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

Division of Drinking Water

July 5, 2016

Mr. Nicholas Wells
City Manager
City of Holtville
121 W. 5th Street
Holtville, CA 92250

CITY OF HOLTVILLE, SYSTEM NO. 1310005 CITATION 05-14-11C-014: TTHM REDUCTION PLAN

Dear Mr. Wells:

On June 8th, 2016, State Water Resources Control Board, Division of Drinking Water (Division) received from the City of Holtville (Holtville) an update to the March 18th, 2016 proposed total trihalomethanes (TTHM) reduction plan. The Division has reviewed and approves the plan as submitted provided Holtville complies with the following conditions:

- 1) By August 1, 2016, Holtville shall complete the SUSP rate study that includes the Spray Aeration Project.
- 2) By July 29, 2016, Holtville shall revise the March 2016 Project Schedule, enclosed, to include the new rate study completion deadline, and resubmit the schedule for Division approval.
 - a. Holtville shall comply with the DDW approved Spray Aeration Project schedule.
- 3) Holtville shall implement the approved TTHM Reduction Plan, which includes the following elements at a minimum:
 - a. Holtville shall contact the Division via email and provide the dose and the date Holtville begins permanganate dosing.
 - b. Total Organic Carbon (TOC) monthly monitoring shall be conducted at the following three locations:
 - i. Pear Canal (raw untreated sample),
 - ii. Raw Water Ponds settled effluent (taken off 12" inlet pipe at water plant),
 - iii. Post filtration (taken from filter clearwell sample line)
 - c. The monthly TOC monitoring at Pear Canal and the Distribution System Entrance shall be submitted via EDT to the following PS Codes:

FELICIA MARRAS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

1350 Front Street, Room 2050, San Diego, CA 92101 | www.waterboards.ca.gov

TOC Sample Site	PS Code
Pear Canal	1310005-001
Raw Pond	No EDT
Distribution System Entrance	1310005-002

- d. Monthly TTHM and HAA5 monitoring shall be performed at the following three locations:

- i. Existing Stage 2 DBPR monitoring location Site #9
- ii. Existing Stage 2 DBPR monitoring location Site #10
- iii. Entrance to the distribution system

- e. The DBP monitoring data shall be submitted via EDT to the following PS Codes:

Stage 2 Sample Site	PS Code	Pressure Zone
Site #9, Hydrant	1310005-900	Main Zone: NW
Site #10, Hydrant	1310005-901	Main Zone: SW
Distribution System Entrance	1310005-002	Post-clearwell

- f. Holtville shall ensure the contracted laboratory EDTs the analysis results for total trihalomethanes and haloacetic acid analyte levels, and all of the disinfection byproduct sub-species. The complete list of DBP analytes is listed in the table below:

Analyte	Sub-Species
Total Trihalomethanes (TTHMs)	Bromodichloromethane
	Bromoform
	Chloroform (Trichloromethane)
	Dibromochloromethane
Haloacetic Acids (HAA5)	Monochloroacetic Acid (MCAA)
	Dichloroacetic Acid (DCAA)
	Trichloroacetic Acid (TCAA)
	Monobromoacetic Acid (MBAA)
	Dibromoacetic Acid (DBAA)

- g. Holtville shall provide to the Division Quarterly Progress Reports for the TTHM Removal System and the Spray Aeration Project. Quarterly updates shall be submitted by the 10th day of the months of February, May, August, and November.

Mr. Nicholas Wells
City of Holtville

System No. 1310005
July 5, 2016

If you have any questions regarding this letter, please contact Alan Tell or me at 619-525-4159.

Sincerely,


 Sean Sterchi, P.E.
District Engineer

Enclosure: March 2016 Project Schedule

cc: Jeff Lamoure, Deputy Director for Environmental Health Services, County of Imperial (via email)

Nicholas Wells, City Manager
City of Holtville
121 W 5th St
Holtville, CA 92250

Frank Cornejo
City of Holtville Water Treatment Plant
Water and Wastewater Operations Supervisor
121 W. 5th Street
Holtville, CA 92250

Alex Chavez, Public Works Foreman
City of Holtville
121 W 5th St
Holtville, CA 92250

Attachment 2

Attachment PER-e

**City of Holtville
DWSRF Water Tank and System Improvements
Project Schedule**

No	Project Milestone	Duration Period	Start Date	End Date
1.	DWSRF General Application Packet Completed/Submitted to State	1 mo	01/31/16	2/31/16
2.	DWSRF Environmental Packet Completed/Submitted to State	2 mos	01/31/16	3/31/16
3.	DWSRF Technical Packet Completed/Submitted to State	4 mos	01/31/16	05/31/16
4.	Rate Study is Completed by Consultant	2 mo	03/31/16	05/31/16
5.	DWSRF Financial Application Packet Completed/Submitted to State	3 mos	02/31/16	05/31/16
6.	Design and Specifications are Completed by City/Submitted to State	3 mos	03/31/16	06/31/16
7.	State Performs and Completes Application Reviews	3 mos	05/31/16	08/31/16
8.	State and City Council enter into Financing Agreement	1 mo	08/31/16	09/31/16
9.	Rate Increase is adopted by City of Holtville	1 mo	08/31/16	09/31/16
10.	RFP for Construction Management is Issued	1 mo	08/31/16	09/31/16
11.	Construction Project is Put Out to Bid	1 mo	08/31/16	09/31/16
12.	City Awards Construction and Construction Management Services	<1 mo	09/31/16	10/31/16
13.	Contract Documents are Executed and Bonds Accepted	1 mo	10/01/16	10/31/16
14.	Pre-Construction Meeting is Held	< 1 mo	10/31/16	
15.	Construction Period	7 mos	10/31/16	05/31/17

Attachment 3



RON CHAPMAN, MD, MPH
Director & State Health Officer

State of California—Health and Human Services Agency
California Department of Public Health



EDMUND G. BROWN JR.
Governor

May 23, 2013

Mr. Frank Cornejo
Water and Wastewater Operations Supervisor
121 W. 5th Street
Holtville, CA 92250

Dear Mr. Cornejo:

**CITY OF HOLTVILLE, SYSTEM NO. 1310005
STAGE 2 DISINFECTANTS AND DISINFECTION BYPRODUCTS RULE
COMPLIANCE MONITORING PLAN**

The purpose of this letter is to serve as a reminder of the requirements and impending deadlines associated with the Federal - Stage 2 Disinfection Byproduct Rule (Stage 2 DBPR), which has now been incorporated into Title 22, California Code of Regulations, §64530 (d) and 64534.2(d). The letter addresses the following issues:

- Review and approval of City of Holtville (Holtville) Stage 2 DBPR Compliance Monitoring Plan (CMP)
- Reporting Requirements
- Summary of Operational Evaluation Level (OEL) Exceedance Requirements

Per Stage 2 DBPR regulations Holtville is a Schedule 4 system. Schedule 4 systems are defined as systems serving less than 10,000, or not belonging to a combined distribution system in which the largest system serves more than 10,000. As a Schedule 4 system, Holtville submitted a CMP as part of the System Specific Study Initial Distribution System Evaluation (IDSE) report. Holtville's CMP identified two sampling locations on a quarterly monitoring frequency.

Stage 2 DBPR CMP

The locations listed in Table 1 below are the approved Stage 2 sample locations. Please bring to our attention any discrepancies or requests for proposed location changes.

Table 1. Stage 2 Sample Locations

Stage 2 Sample Site	PS Code	Pressure Zone	Source Reservoir
Site #9, Hydrant	1310005-900	Main Zone: NW	Holtville WTP
Site #10, Hydrant	1310005-901	Main Zone: SW	Holtville WTP

Please submit a revised system map showing the approved sampling locations by **September 1, 2013**.

As a Schedule 4 system Holtville must begin using the CDPH approved CMP by October 1, 2013 and must begin sampling in fourth quarter 2013. Based on the IDSE Report, Holtville must monitor in the second week in the months of February, May, August, and November. Holtville's first round of Stage 2 DBPR monitoring is scheduled to begin during the week of November 14th, 2013. As a reminder, for the first three quarters of 2013, please continue compliance monitoring for total trihalomethanes (TTHM) and haloacetic acids (HAA5) per the Stage 1 DBPR.

Please note Holtville is required to conduct the following monitoring and reporting as well:

- Chlorine residual monitoring at the new Stage 2 DBPR locations

Reporting Requirements

Table 1 above lists the new PS Codes that have been assigned to each Stage 2 DBPR monitoring location. Holtville must submit the results electronically using these PS Codes. In addition, laboratory hardcopies must be submitted to the San Diego District office by the 10th day of the month following the monitoring quarter along with the signed Compliance Calculation and OEL Spreadsheet forms (attached). Information on the electronic data transfer (EDT) process can be viewed at the website listed below.

<http://www.cdph.ca.gov/certlic/drinkingwater/Pages/EDT.aspx>

Operational Evaluation Levels (OELs) & OEL Report

Please note that compliance with each locational OEL is a new requirement. The OEL is a LRAA threshold meant to help systems identify if they are in danger of exceeding the MCL in the following quarter. The OEL is calculated in the following manner

$$OEL = \frac{Quarter\ 1 + Quarter\ 2 + (2 * Quarter\ 3)}{4}$$

If the calculated OEL for any quarter exceeds the limits of 80 ppb for TTHM or 60 ppb for HAA5, then the system is required to perform an Operational Evaluation and submit an Operational Evaluation Report to CDPH no later than 90-days after being notified by the laboratory of the analytical result that causes the OEL to exceed the limit.

The Operational Evaluation process is useful in that it alerts the system to the potential of a MCL violation, if DBPs remain at the current level. Additionally, the Operational Evaluation Report encourages a review of source water quality, as well as treatment and distribution system operational changes that may have contributed to the elevated DBP levels. Systems are required to perform a complete Operational Evaluation (e.g. evaluation of changes in source water quality, treatment, and distribution system conditions) unless sufficient causal evidence of the exceedance is presented to CDPH and CDPH grants approval to conduct a limited scope evaluation. The limited scope evaluation submittal deadline is the same as a full Operational Evaluation Report.

CDPH encourages all systems to review the US EPA's *Stage 2 Disinfectants and Disinfection Byproducts Rule Operational Evaluation Guidance Manual*, 815-R-08-018, available online at:

http://www.epa.gov/ogwdw/disinfection/stage2/pdfs/draft_guide_stage2_operationalevaluation.pdf

This guidance manual is an excellent resource in assisting treatment and distribution staff in evaluating water quality dynamics within the system. In order to assist systems in performing these evaluations, copies of the evaluation forms are attached to this letter and electronic pdf forms will be emailed to the system at a later date.

CDPH further encourages all systems that have the potential to exceed the OEL, based on Stage 1 and IDSE monitoring data, to prepare for a Stage 2 DBPR exceedance and begin collecting the data that is necessary to file the Operational Evaluation Report, if not already doing so. Below is a partial list of historical data that is required for filing the report.

Under the Source Evaluation, these elements include, but are not limited to, documenting changes in: raw water detention times, natural organic material levels, rainfall and reservoir turnover events, turbidity, pH, and alkalinity levels, etc.

Under the Treatment Evaluation, these elements include, but are not limited to, documenting changes in: flow rate, chemical feed rate and manufacturer, equipment failures, DBP precursors, effluent chlorine residual, etc.

Under the Distribution Evaluation, these elements include, but are not limited to, documenting changes in: localized temperature and residual trends, O&M events, systemic and high user demand patterns, etc.

Please see the attached evaluation forms for a complete listing of the historical data elements that are necessary for filing an Operational Evaluation Report.

Stage 2 Reporting Requirements

Holtville must report quarterly Stage 2 monitoring results and OEL results to CDPH within 10 days after the end of each quarter in which samples were collected. Please note that CDPH requires both EDT and hard copy submittals of all Stage 2 results. Please see the attached Compliance Calculation and OEL Spreadsheet for the wet signature submittal forms.

Transitioning Existing Stage 1 MCL Violation to Stage 2 Reporting Requirements

During the transition period between Stage 1 and Stage 2 the Public Notification (PN) requirements continue. Specifically, Title 22, CCR, §64463.4 requires Tier 2 public notice when a system exceeds a TTHM and/or HAA5 MCL under Stage 1 or Stage 2. §64463.7 requires a Tier 3 public notice for monitoring and reporting (M&R) violations of either rule. Any activities associated with existing Stage 1 MCL violations are ongoing. Additionally, a system must include in its yearly consumer confidence report (CCR) the range of TTHM and HAAS individual sampling results during the transition period.

Analysis of Holtville's TTHM data indicates that it is likely that the Stage 1 RAA will exceed the MCL during the Stage 1 to Stage 2 transition period. As a result Holtville will be required to provide PN to their consumers that the system is in violation until a four quarter Stage 2 MCL compliance determination has been made.

As part of the PN, CDPH recommends that systems explain that they are collecting and evaluating new data before determining compliance with the MCL using the LRAA. The explanation should also detail the system's actions in addressing the TTHM and/or HAA5 levels, including the use of Stage 2 data to make improved treatment decisions (e.g., data may identify an area in the distribution system with extended water age that the system can then address using water age management). Once the Stage 2 MCL compliance determination has been made and if it shows no exceedance of the Stage 2 MCL, then public notice for the Stage 1 violation is no longer necessary. However, if the Stage 2 MCL has been exceeded, Tier 2 public notice will be required for the Stage 2 MCL violation.

Flushing Practices

In the 2011 Sanitary Survey CDPH noted that Holtville does not perform routine flushing as part of an on-going distribution system water quality management program. However, in review of page 6, Item IV, Subpart 4 of the System Specific Study, CDPH noted that Holtville stated that it is standard practice to flush water lines prior to sampling. Per Title 22, CCR, §64534(c), "Systems shall take all samples during normal operating conditions". CDPH is concerned that the aforementioned flushing practice could affect the ability of the samples to be representative of the water quality in the sample area. If the purpose of the flushing program is to alter the water quality in the sample area, then the flushing action cannot coincide with water quality sampling and must be part of a routine system wide flushing practice. If the purpose of the flushing

Mr. Cornejo
May 23, 2013

City of Holtville
System No. 1310005

practice is to discharge standing water from within the fire hydrant and have the sample representative of the distribution line, then the flushing period would be measured in seconds.

Your attention to this matter is greatly appreciated. If you have any questions, please contact Mr. Scott Ketcham at (619) 525 4395.

Sincerely,



Sean Sterchi, P.E.
District Engineer

Enclosures:

- Compliance Calculation & OEL Spreadsheet
- OEL evaluation forms.

cc: Jeff Lamoure, Deputy Director - Division of Environmental Health, Imperial County
Public Health Department

Attachment 4

State Water Resources Control Board

Division of Drinking Water

June 29, 2016

Guidelines for Electronic Submission of Documents

To ensure consistent and reliable processing of the documents you submit to the Division of Drinking Water (DDW), please follow the formatting, labeling, and submission procedures described below:

CREATION OF ELECTRONIC DOCUMENTS (PDF FILES)

For more efficient processing, we request that you submit all documents to DDW offices **in a Portable Document Format (PDF) file**.

Please note that after review of your submission, DDW staff may request a hardcopy of certain documents, particularly drawings or maps that require a large size to be readable. In other cases – for instance, where the evaluation of data is required – DDW staff may request that documents be submitted in other electronic formats

1) Convert your submittal into PDF format. The PDF file should:

- a. Have a one-to-one relationship between the document being created and the information within the document. For example: If you are submitting both monthly bacteriological results and a monthly treatment plant monitoring report, you would create two separate documents: one document labeled appropriately for the bacteriological results and one document labeled appropriately for the treatment plant monitoring report.
- b. Contain the entire document, maintaining organization and layout, including page orientation, size, margins, fonts, table formats, page numbers, etc.
- c. Be clear and legible.
- d. Be named per the instructions in Item #2 below.
- e. Allow the reviewer to copy text and images into common word processing documents. For scanned documents, the document should be processed using Optical Character Recognition (OCR). If you do not have this technology, we will attempt to process the document using OCR as deemed necessary.

Note: Where a signature is specifically required by law or regulation, you should sign the document prior to converting to a PDF file and maintain the signed hardcopy of the document in your records for the period of time prescribed in the law or regulation.

2) Name each individual PDF file as follows:

- a. Create a filename with the following information:
 - i. Water System Number—(e.g. 1234567)
 - ii. Water System Name—(e.g. ABC Water Company)
 - iii. Compliance Period—Year and month or quarter that the document covers, if applicable—(e.g. 2015July).
 - iv. Document Link—Use the following table to choose the Document Link that applies to the document you are submitting:

Document Link	Documents Pertaining to:
TCR	Monthly monitoring and summaries for the Total Coliform Rule and Revised Total Coliform Rule (RTCR) (routine distribution system bacteriological monitoring data) including triggered source water monitoring
SWTR	Monthly treatment plant monitoring reports for surface water
WTP	Monthly treatment plant monitoring reports, non-surface water
RAWB	Raw (source) water bacteriological data
RAWC	Raw water chemical monitoring data
LT2	Raw water monitoring in accordance with Long Term 2 Enhanced Surface Water Treatment Rule (LT2ESWTR)
LCR	Lead and copper tap sampling data
PN	Public notification documents
MRDL	Disinfectant running annual average reporting
DBP	Disinfection byproduct reporting
GP	Distribution monitoring for general physicals
FL	Fluoridation Monitoring
NIT	Distribution Nitrification Monitoring
QPR	Quarterly progress report
CCT	Corrosion Control Treatment related documents and reports
ENP	Emergency Notification Plan
RW	Recycled Water

Note: If there is not an applicable Document Link in the table above, use a word that describes the subject of the document you are submitting.

Example of complete filename: 1234567-ABC Water Company-2015July-TCR

SUBMISSION OF ELECTRONIC DOCUMENTS

1) Submission via Email

Note: DDW email servers can only receive emails less than or equal to 50 megabytes (50 MB) in size

Attach **one** PDF file to an email. Enter the same information in the Subject line of the email as you used in the filename for the attachment to the email (e.g.,

"1234567-ABC Water Company-2015July-TCR"); see Item # 2 above for instructions. Send to:

DDWSanDiego@Waterboards.ca.gov

2) Submission of files greater than 50 MB in size

- a. Split documents into files smaller than 50 MB total and email per instructions in #1 above; OR
- b. Upload your documents to a DDW FTP website. Contact the DDW District office that oversees your water system for further details; OR
- c. Transfer onto a CD-ROM. **After transfer of the document to CD-ROM, verify it is readable.** Label the jewel case or envelope of the CD-ROM with the water system number and name (e.g., "1234567-ABC Water Company"). Mail to the address listed below:

1350 Front Street Room 2050
San Diego, CA 92101

3) Submitting checks for payment of fees

The DDW does not accept electronic transfer of funds. Please continue to **mail** all checks to the address you normally send them to, along with a paper cover letter and any necessary attachments.

Special instructions regarding laboratories:

Please note that labs must continue submitting chemical monitoring data through electronic data transfer (EDT) using the established procedure, as described at:

http://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/EDT.shtml.

Use of this guidance and updates:

Please be advised that not following the formatting guidelines above may cause a delay in the review of your submission, and you may be requested to resubmit document(s). This guidance may be updated periodically to reflect the evolving nature of the technology and the experience of those using this technology. You will be notified of any changes that affect your water system.

Attachment 5

Drinking Water Notification to Consumers

PROOF OF NOTIFICATION

Name of Water System: _____

Please explain what caused the problem if you have determined what it was and what steps you have taken to correct it. _____

Consumers Notified _____ Yes _____ No

If not, Explain: _____

Date of Notification: _____

On the date of notification set forth above, I served the above referenced document(s) on the consumers by:

_____ Sending a copy through the U.S. Mail, first class, postage prepaid, addressed to each of the resident(s) at the place where the property is situated, pursuant to the California Civil Code. Attach copy of Notice.

_____ Newspaper (if the problem has been corrected). Attach a copy of Notice.

_____ Personally hand-delivering a copy to each of the consumers. Attach a copy of Notice.

_____ Posted on a public bulletin board, that will be seen by each of the consumers (for small, non-community water systems with prior Department approval). Attach copy of Notice.

I hereby declare the forgoing to be true and correct under penalty of perjury.

Dated: _____

Signature of Person Serving Notice

**** Notice:** Complete this Proof of Notification and return it along with a copy of the notification to the Department within 10 days of posting the notification.

Disclosure: Be advised that the California Health and Safety Code states that any person who knowingly makes a false statement on any report or document submitted for the purpose of compliance with the attached order may be liable for a civil penalty not to exceed five thousand dollars (\$5,000) for each separate violation for each day that violation continues. In addition, the violators may be prosecuted in criminal court and upon conviction, be punished by fine of not more than twenty-five thousand dollars (\$25,000) for each day of violation, or be imprisoned in county jail not to exceed one year or by both the fine and imprisonment.

